

Dear Federal Communications Commission (FCC),

We appreciate the opportunity provided by the FCC for stakeholders to offer comments in response to **DA 25-219**, which advocates for **reducing unnecessary regulatory burdens**. In the context of rapidly evolving global communication technologies and shifting market demands, the FCC, as a global leader in wireless regulatory policy, plays a crucial role in setting industry trends, optimizing regulatory frameworks, and fostering innovation and competition. We hope that the FCC will, while ensuring technological safety, periodically assess the **cost-benefit** of relevant regulations and streamline or eliminate requirements that are no longer necessary or could be optimized, thereby reducing regulatory burdens and enhancing industry efficiency.

This proposal focuses on the **Pre-Approval Guidance (PAG)** mechanism within the FCC's equipment certification process, particularly the PAG requirements in **KDB 388624 D02** related to **Time-Average SAR, Wi-Fi 6E, Hall Effect Sensors**.

We fully understand the original intent of the PAG process: to provide necessary supplementary guidance in the certification process when no specific guidelines exist for new technologies, new devices, or new application scenarios, ensuring regulatory compliance. However, with the **mature application of Time-Average SAR, Wi-Fi 6E, and Hall Effect Sensors** in the market, the applicability of current PAG requirements needs reassessment. We believe that, given the relative maturity and stability of technical solutions and testing processes, appropriately **relaxing or optimizing PAG requirements** will enhance industry efficiency and promote market competition.

Reasons for Recommendation

Mature Technology and Strong Market Demand

- **Time-Average SAR:** Over the past decade, this technology has been widely used in wireless devices for electromagnetic exposure evaluation management, ensuring consumer radiation safety.
- **Wi-Fi 6E:** Since its **commercial approval by the FCC in April 2020**, Wi-Fi 6E has become a mainstream technology for high-bandwidth, low-latency communication.
- **Hall Effect Sensors:** Used extensively in mobile devices since **2010**, primarily for precise positioning and determining device open/close states.

These technologies have transitioned from cutting-edge innovations to mainstream applications. However, overly stringent PAG requirements may delay product launches, hindering consumers from accessing the latest technological advancements quickly and contradicting the FCC's goal of fostering innovation.

Reducing Administrative Burden and Enhancing Market Competitiveness

Appropriately adjusting PAG requirements would provide quantifiable benefits to three key stakeholders:

- **FCC:** Reducing the workload associated with PAG case reviews, increasing review efficiency, and allowing regulatory resources to focus on more critical issues.
- **TCBs (Telecommunication Certification Bodies):** Simplifying related PAG procedures would shorten certification timelines, improve case-handling capacity, and boost performance.
- **Manufacturers:** Lowering the risk of certification delays, reducing the product launch cycle by **2-4 weeks**, and improving market responsiveness. For small and medium-sized enterprises, streamlining procedures would enhance market competitiveness. Given the intensifying global competition, the timeliness and flexibility of product certification are critical.

Proposed Solutions

Regarding the PAG requirements for **Time-Average SAR (PAG item: PWRCN)**, **Wi-Fi 6E (PAG item: OVER6G/UN6GHZ)**, and **Hall Effect Sensors (PAG item: TXSENS/PWRCNG)** in **KDB 388624 D02 v18r07**, we propose the following:

1. Prioritize Exempting These Technologies from PAG Requirements or Specific PAG Elements

- As mentioned earlier, these technologies have been commercially deployed in the U.S. market for years, and existing testing guidelines are already well-established (e.g., **KDB 388624 D02**, **KDB 987594**, **TAS pre-PAG report**). Manufacturers should be allowed to submit independent compliance test reports without additional FCC guidance or, alternatively, use the **KDB Inquiry** process to present PAG checklist documentation for FCC review to qualify for PAG exemption.
- For **Time-Average SAR** algorithms, we suggest that the FCC may limit PAG exemption only to **algorithms that have been verified and approved by the FCC**.

2. If Exemption Cannot Be Achieved, Consider Including the Relevant Technologies in the PAG Reuse List.

- If, for any reason, some or all of these technologies cannot be fully exempted from the PAG process, we respectfully request that the FCC consider setting specific technical conditions to include **Time-Average SAR, Wi-Fi 6E, and Hall Effect Sensors** in the **PAG Reuse List**. This would prevent redundant PAG execution when multiple products share the same technology.
- For example, if a manufacturer subsequently launches new products based on the same technical architecture, they should qualify for a streamlined reuse mechanism.

Conclusion

By appropriately optimizing PAG requirements, the FCC can accelerate technological innovation, reduce compliance burdens on enterprises, and enhance market competitiveness, further strengthening the United States' leadership in the global wireless communications industry. We appreciate the FCC's thoughtful consideration of this proposal and look forward to further discussion.

Sincerely

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